

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ATLAS GLOBAL TECHNOLOGIES LLC,

Plaintiff,

v.

TP-LINK TECHNOLOGIES CO., LTD.,
TP-LINK CORPORATION LTD, and
TP LINK INTERNATIONAL LTD.,

Defendants.

Civil Action No. 2:21-cv-430-JRG

JURY TRIAL DEMANDED

**DECLARATION OF YANMEI ZHANG IN SUPPORT OF DEFENDANTS' MOTIONS
TO DISMISS FOR LACK OF PERSONAL JURISDICTION, DEFENDANTS' MOTION
TO DISMISS FOR INSUFFICIENT SERVICE OR PROCESS, AND DEFENDANTS'
OPPOSED MOTION UNDER 28 U.S.C. 1404(a) TO TRANSFER THE ACTION TO THE
CENTRAL DISTRICT OF CALIFORNIA**

I, Yanmei Zhang, declare as follows:

1. I am an Operation Director of TP-Link Technologies Co., Ltd., which was renamed TP-Link Lianzhou Co., Ltd. (“TP-Link China”) in December 2021. I submit this declaration in support of Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction, Motion to Dismiss for Insufficient Service of Process, and Motion to Transfer Venue to the Central District of California in the above-referenced case. I have person knowledge of the matters stated in this Declaration.

2. TP-Link China is a privately held corporation organized under the laws of China, with its headquarters and principal place of business in Shenzhen, China.

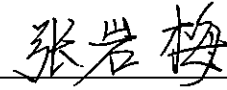
3. TP-Link China does not have any employees or agents in Texas. Nor does it own, lease, or operate any offices or other facilities in Texas. TP-Link China does not design, manufacture, sell, or offer to sell any products in Texas. TP-Link China does not ship products to Texas, and it does not conduct any marketing or advertising in, or directed toward, Texas.

4. TP-Link USA Corporation (“TP-Link USA”) is a California corporation with its headquarters and principal place of business in Irvine, CA. TP-Link USA is solely responsible for importing, marketing, advertising, offering to sell, and selling “TP-Link branded” products in the United States, including the products at issue in this case. TP-Link USA is a wholly owned subsidiary of TP-Link UK, Ltd, which also has not been named as a Defendant. TP-Link China does not direct or control the activities of TP-Link USA in importing, marketing, advertising, offering to sell, or selling TP-Link branded products in the United States. Plaintiff has submitted a Declaration from Richard Xu dated June 24, 2013 that stated “TP-LINK USA is a subsidiary of TP-LINK Tech; however, TP-Link Tech does not control the day-to-day management of TP-Link USA. TP-LINK USA is its own independent business and makes its own corporate

decisions.” Dkt. 20-2 at ¶4. However, at all times relevant to this case, TP-Link USA was not, and is not, a subsidiary (either directly or indirectly) of TP-Link China.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 16, 2022.

A handwritten signature in black ink, appearing to read '张岩梅' (Zhang Yanmei), is written over a horizontal line.

Yanmei Zhang